

LAW OFFICES

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\*\*Of Counsel

August 21, 2018

**Via Facsimile (212.805.4060)**

Clerk, Magistrate's Office  
ATTN: Benny - Criminal Docket  
United States Courthouse  
500 Pearl Street, Room 5120  
New York, New York 10007-1312

**Re: USA v John Geraci: Criminal Complaint**  
**Southern District of New York Case No.: 18-mj-5904**

Dear Clerk:

Following this transmittal letter for filing in the above-referenced matter is correspondence which is an application for an extension of time to meet the bond requirements in the above-referenced matter. Because I am not been admitted to the Southern District of New York in this matter, except for presentment and bond, we are following the same protocol as instructed by Judge Parker's Court, where I first appeared, which is to communicate with the Court by way of facsimile on the issue of bond. We are respectfully submitting a second request to extend the time necessary to comply with the conditions of bond by way of the attached application letter. The following letter is addressed to Judge Parker, although I understand it will be submitted to this week's magistrate judge.

Should you need additional information to process this Motion, please contact my paralegal, Trish Moore, at: 305.446.6116.

Thank you for your courtesies in this regard.

Respectfully,

*s/Michael J. Rosen*

Michael J. Rosen

MJR:plm  
Encls.  
cc: AUSA Richard Cooper

*Application Granted.  
Time to meet all  
bond requirements  
extended to and through  
8/31/18.*

*So ordered.*

*Robert W. Lehburger  
USDC*

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August 21, 2018

Hon. Katharine H. Parker  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

**Re: USA v John Geraci; Criminal Complaint**  
Southern District of New York Case No.: 18-mj-5904

Dear Judge Parker:

I remain temporary counsel to Mr. John Geraci for the purpose of his presentment and bond issues. We are applying, unopposed, for a second extension to meet all bond requirements.

Mr. Geraci's deadline to meet his *bond* requirements initially expired on August 14, 2018. Due to the extenuating factors that caused a delay in meeting that deadline, we applied for (08.14.18) and were granted (8.15.18) a deadline extension through today, August 21<sup>st</sup>.

Since the initial extension was granted, we have accomplished the following:

1. The co-signors of the Bond have been interviewed and approved.
2. The Bond has been signed by each co-signor.
3. The Confession of Judgment has been signed by the property owner to secure the bond of \$750,000.00.
  - a. This document has been approved by the AUSA, subject to any changes required to properly record this document.

We need additional time to complete the following conditions of bond:

1. Record the Confession of Judgment, in Los Angeles County, California;
2. Forward the complete package to the AUSA Cooper; and
3. Have all appropriate documents filed with the Court.

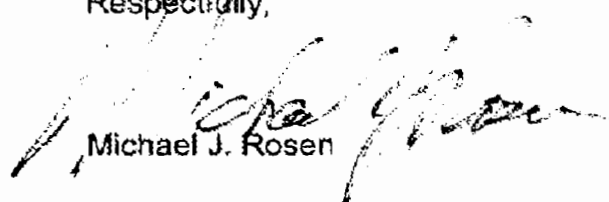
Hon. Katharine H. Parker  
August 21, 2018  
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Because Defendant, John Geraci, is dealing with not only three different districts, but three different states, the process is taking longer than anticipated.

For the foregoing reasons, Defendant, John Geraci requests an extension through and including August 31, 2018 to complete the necessary documentation to fulfill Mr. Geraci's bond requirements in this above-referenced matter.

AUSA Richard Cooper, on behalf of the United States of America, does not oppose this extension.

Respectfully,



Michael J. Rosen

MJR:plm

cc: AUSA Richard Cooper  
Client